

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Joseph Berti
Debtor,

Nationstar Mortgage LLC
Movant.

v.

Joseph Berti
Debtor/Respondent,

William C. Miller, Trustee
Additional Respondent.

BANKRUPTCY CASE NUMBER
16-11046/MDC

CHAPTER 13

11 U.S.C. § 362

CERTIFICATION OF DEFAULT

The undersigned, Attorney for Movant, certifies that Debtor has defaulted upon the terms of this Court's Stipulation and Order dated August 4, 2020. It is further certified that the attached notice, marked as Exhibit "A," was served upon the Debtor and Debtor's Attorney on January 14, 2021. The Debtor has failed to cure the default as set forth in the Notice. The Debtor has failed to make the following payments:

Regular payments of \$942.75 from December 1, 2020 through February 1, 2021	\$2,828.25;
Attorney Fees associated with this default	\$300.00
Less Debtor's Suspense	\$(936.73)
TOTAL DEFAULT	\$2,191.52

Accordingly, pursuant to the Stipulation and Order, Movant respectfully requests this Court to enter the attached Order granting Movant relief from the automatic stay.

Respectfully submitted,

/s/ Kristen D. Little

Dated: February 3, 2021

BY: _____
Christopher A. DeNardo 78447
Kristen D. Little 79992
Law Offices of LOGS Legal Group LLP
LOGS Legal Group LLP
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610) 278-6800
logsecf@logs.com

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NATIONSTAR MORTGAGE LLC'S
NOTICE OF DEFAULT OF STIPULATION

RE: PROPERTY KNOWN AS 3249 Princeton Avenue, Philadelphia, PA 19149

TO:

Joseph Berti
3249 Princeton Avenue
Philadelphia, PA 19149

Brad J. Sadek, Esquire
1315 Walnut Street
Suite 502
Philadelphia, PA 1
Sent via electronic notification: brad@sadeklaw.com

You are hereby notified that the Debtor is in default of the terms of the Stipulation entered into by the parties and approved by the Court. The Debtor has failed to make the following payments and late charges:

Regular payments of \$942.75 from November 1, 2020 through January 1, 2021 which total \$2,828.25;

Attorney fee of \$100.00 for this Notice of Default

Less Debtor's Suspense (\$929.48)

TOTAL DEFAULT AS OF JANUARY 13, 2021 IS \$1,998.77

If the default continues to the following month, the Debtor shall include funds to cure that month's default as well. Pursuant to the terms of the Stipulation, the full cure of the default must be via certified funds, money orders or cashier's check, with the loan number clearly written thereon and made payable to Nationstar Mortgage LLC d/b/a Mr. Cooper. During pendency of

this default, please remit all payments to: c/o LOGS Legal Group LLP, 3600 Horizon Drive, Suite 150, King of Prussia, PA 19406

The default must be cured within 15 days from the date below or Movant shall file a Certification of Default with the Court and request the Court to enter an Order granting Movant relief from the Automatic Stay.

Respectfully submitted,

Dated: January 14, 2021

BY: /s/ Kristen D. Little

Christopher A. DeNardo 78447

Kristen D. Little 79992

Law Offices of LOGS Legal Group LLP

LOGS Legal Group LLP

3600 Horizon Drive, Suite 150

King of Prussia, PA 19406

(610) 278-6800

logsecf@logs.com

File #: 15-049385

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CERTIFICATE OF SERVICE

I, Kristen D. Little an employee of the law firm of LOGS Legal Group LLP hereby certify that I caused to be served true and correct copies of Certification of Default by First Class Mail, postage prepaid, at the respective last known address of each person set forth below on February 3, 2021:

Joseph Berti
3249 Princeton Avenue
Philadelphia, PA 19149

Brad J. Sadek, Esquire
1315 Walnut Street
Suite 502
Philadelphia, PA 19107 - VIA ECF

William C. Miller, Trustee
P.O. Box 1229
Phila, PA 19105- via ECF

I HEREBY CERTIFY UNDER PENALTY OF PERJURY THAT THE FOREGOING IS
TRUE AND CORRECT.

/s/ Kristen D. Little

Christopher A. DeNardo 78447
Kristen D. Little 79992
Law Offices of LOGS Legal Group LLP
LOGS Legal Group LLP
3600 Horizon Drive, Suite 150
King of Prussia, PA 19406
(610) 278-6800
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ORDER

AND NOW, this _____ day of _____, 2021, after notice to all required parties and certification of default under the terms of this Court's Order of August 4, 2020 it is

ORDERED AND DECREED that the Automatic Stay of all proceedings, as provided under Section 362 of the Bankruptcy Abuse Prevention and Consumer Protection Act of 2005 (the "Code"), 11 U.S.C. § 362, is lifted to allow Movant, or its successors, if any, to proceed with, or to resume proceedings in Mortgage Foreclosure, including, but not limited to Sheriff's or Marshal's Sale of 3249 Princeton Avenue, Philadelphia, PA 19149; and to take action, by suit or otherwise as permitted by law, in its own name or the names of its assignee, to obtain possession of said premises; and it is

FURTHER ORDERED that Rule 4001(a)(3) is not applicable and Movant, or its successors, if any, may immediately implement this order.

BY THE COURT:

HONORABLE MAGDELINE D. COLEMAN
UNITED STATES BANKRUPTCY JUDGE